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• BEAU BRADY LEBARON - SELF REPRESENTED Pg 1 of March 23, 2021 at 10:00 a.m. (Eastern Time) Response Deadline: March 2, 2021 at 4:00 p.m. (Eastern Time)

CLAIMENT / CREDITOR # 24733 - 24734

•UNITED STATES BANKRUPTCY COURT SOUTHERN

Presiding Judge: Honorable Robert D. Drain

DISTRICT OF NEW YORK

Presiding Judge: Honorable Robert D. Drain

Case No. 18-23538 (RDD)

-----X

(Jointly Administered)

re

SEARS HOLDINGS CORPORATION, et al.,

Debtors.1

(714) 476-0192

I AM: BEAU BRADY LEBARON 217 E ACACIA APT A BREA CA 92821

PLEASE TAKE NOTICE OF MY OPPOSITION /RESPONSE TO THE 23rd OMNIBUS FEB 9 2021 DOCUMENT 9284 WERE WITH THE OBJECTION EXIST FOR CLAIMS LISTED BELOW:

(714) 582-2721 CLAIM(S)#24733 18-23538 (#24734 -18-23555)CLAIMANT / CREDITOR . CREDIT LIFE WAGES, COMMISSIONS, WAITING TIME PENALTIES AS PER THE SUBMISSION SIGNED PLEASE SEE EXHIBIT A 1

TOTAL VALUE \$70,615.73

PLEASE TAKE NOTICE I OPPOSE THE OBJECTION AND DISALLOWANCE FOR THE OF CLAIM (S)

\$70,615.73 PLEASE THE PAGES

PLEASE TAKE FURTHER NOTICE!

BEAU BRADY LEBARON CLAIMANT IN 18-23538#24733 /#24734 18-23555 TOTAL VALUE \$70,615.73

I OPPOSE THE OBJECTION, THE DISALLOWANCE, EXPUNGMENT & POTENTIAL REDUCTION TO THE CLAIM(S) THAT WERE FILED ON 4/13/2020 FOR REASONS THJAT APPLY TO EXCUSABLE NEGLECT SET FORTH BY THE COUNSEL IN THE 23RD OMNI BUS DOCUMENT 9284 DATED FEBRUARY 9 TH 2021 ALL EXHIBITS WHERE I, THE CLAIMANT AND THE ABOVE STATEED CLAIMS LISTED ONLINE 210 OF EACH EXHIBIT.

AND I ASK THE COURT TO CONSIDER CREDITOR

may neve1theless file a late claim if the failure to file a timely claim was due TO

"excusable neglect".

FED. R. BANKR. P. 9006(b)(I). The burden of proving "excusable neglect" rests on the late-claimant. Enron, 419 F.3d at 121 (quoting Jones v. Chemetron Corp., 212 F.3d 199, 205 (3d Cir. 2000)). hl Pioneer, the COURT expanded the definition of "excusable neglect" to include, where appropriate, "inadvertence, mistake, or carelessness." 507 U.S. at 388. Ultimately, the COURT stated, the dete1mination whether to allow a late claim is an equitable one that takes account of all of the surrounding circumstances:

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co (0680); ServiceLive Inc (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc (6537); Innovel Solutions, Inc (7180); Kmart Corporation (9500); MaxServ, Inc (7626); Private Brands, Ltd (4022); Sears Development Co (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc (6742); Sears Home Improvement Products, Inc (8591); Sears Incurance Services, LLC (7182); Sears Procurement Services, Inc (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc (4861); Sears Roebuck Acceptance Corp (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9620); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc (6327); Florida Builder Appliances, Inc (9133); KBL Holding Inc (1295); KLC, Inc (0839); Kmart of Michigan, Inc (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC (5554); Sears Protection Company (Florida), LLC (4239); SHC Desert Springs, LLC (None); SOE, Inc (9616); StarWest, LLC (3379); STI Merchandising, Inc (0188); Troy Coolidge No 13, LLC (None); BlueLight com, Inc (7034); Sears Brands, LLC (4664); Sears Buying Services, Inc (6533); Kmart com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816) The location of the Debtors' corporate headquarters is c/o M-III Partners, LP, 1700 Broadway,

COUNSEL FOR THE DEBTOR WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153 Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Ray C. Schrock, P.C.
Jacqueline Marcus
Garrett A. Fail

Sunny Singh Attorneys for Debtors and Debtors in Possession PAGE 2 18-23538-shl Doc 9336 Filed 03/02/21 Entered 03/03/21 17:39:31 Pages 1 through 7 Pg 2 of 7

TO THE HONORABLE JUDGE

ROBERT D. DRAIN * CASE 18-23538 24733 18-23555 24734

United states bankruptcy court southern district of new york

<u>PLEASE TAKE NOTICE</u> I BEAU BRADY LEBARON OPPOSE DEBTORS' TWENTY-TIDRD OMNIBUS OBJECTION TO PROOFS OF CLAIM (NO LIABILTY CLAIMS). MARCH1ST2021.

AND FILED A RESPONSE TO THE DEBTORS Twenty-Third Omnibus OPPOSITION Proofs of Claim (No Liability Claims)

(the "Objection") with the United States Bankruptcy Court for the

Southern District of New York (the "Bankruptcy Court").

Presiding Judge: Honorable Robert D. Drain

FOR FAILURE TO MEET BAR DATES AS STATED IN DOC 9284

I WORKED AS W2 EMPOYEE PROJECT CONSULTANT FOR THE DEBTOR BEFORE DURING AND AFTER BAR DATES 2/22/19 AND AL DATES ON OR BEFORE 6-12-19 . HIRED BY NEW OWNER NOT UNTIL 6-12-19 AS PER THE ATTACHMENT FROM THEM SUPPLIED 2-17-19.

THE DEBTOR SHOWS ME HERE AS A VENDOR WHICH IS NOT CORRECT AND THE DEBTOR CLAIMS TO HAVE INVESTIGATED MY PAY WHERE IT SHOWS EXHIBIT A-D THAT I WAS A W2 EMPLOYEE WHERER IN CALIFORNIA LAW I AM DUE WAGES UPON SEPARATION AND OR UP ON CONPLETION OF PROJECTS WERE DEDUCTIONS WERE ENTERED TO FORCE ME TO AVBSORB COPANY LOSS BEFORE DURING AND AFTER THE FILING DATE 10-15-18. THIS IS A IS MY REQUEST TO THE COURT TO ENFORE THE PAYMENT OF WAGES AND I DO NOT HOLD THE LAW BOOKS OR THE DEGREE TO CONTEST THE STATEMENT BY MR LITZ ON SEPT 2 2020 - TO NOW TODAY THAT I AM INVALID!. HOW IS AN LOYAL EMPLOYEE WHO WORKS THORUGH A BANK RUPTCY TO BE HIRED BY THE NEW OWNER INVALID? I HAVING PERFORMED MY DUTIES TO THE BEST OF MY ABILITY AND PROVIDED REVENUE IN EXCESS MY PRIOJECTS \$ 6 8 0 , 0 0 0 . 0 0 AS WELL AS \$42,000.00 JAN TO FEB 2019 .REVENUE THAT WAS AUTHORIZED BY THE DEBTORS ADMIN DEOT MGMT AND CALL CENTERS SIGNED BY CLIENTS WERE I WAS SUPPLIED APPTS THAT I WAS REQUIRED TO BY EMPLOYEE JOB DESCRIPTION TO SELL . EVEN WHEN I WAS LEASED TO THE NEW BUYER WITHOUT SPECIFIC KNOWLEDGE AND WERE LIZED BY THE DEBTOR BEFORE DURING AND AFTER THE BAR DATES THAT DOC 9284REFER TO. SEE PAGES 3 4AND 5 OF THIS DOC FOR THE REFERNCE ,EXHINIT AND LINE NUMBER. FOR EAH OF THE INSTANCE WHERE I AM LIST ON LINE 210 STATING"

The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February22 ,2019 (ECF No.2676)

AND

PLEASE ALSO TAKE NOTICE IT IS WRITTEN AND FULLY UNDERSTANDABLE THAT

The Federal Bankruptcy Rules direct a bankruptcy court to establish bar dates in chapter 11cases. The bar date is critically important to the administration of a successful chapter 11case, and the reorganization process:

IT HAS BEEN DECIDED BY NUMBEROUS CASES IN THE STATE OF NEW YORK THAT an Employee may file a late claim if the failure to file a timely claim was due to"e EXCUSABLE NEGLECT.

PLEASE TAKE NOTICE I WAS WORKGIN2/22/19 IN FACT SELLING A PROJECT FOR THE OLD OR NEW AS I WAS NOT TERMINATED BY DEFINITION AND IN FACT LEASED AT THI S TIME AS MY PROJECTS WERE BACKED BY A SEARS HOLDINGS CORP POLICY CREDIT DEPT ADMIN AND MORE AND PLEASA TAKE NOTICE THESE ARE THE SAME DEPTS **THEN AS TRANSFORMCO AND ALL OF ITS <u>I</u>TDENTIES.**

PLEASE TAKE NOTICE TO 181FED. R.BANKR.P. 9006(b)(l). The burden of proving "excusable neglect" rests on the late-claimant. Enron 419 F.3d at 121 (quoting Jones v.Chemetron Corp, 212 F.3d 19 9, 205 (3d Cir. 2000)). In Pioneer the Court expanded the definition of "excusable neglect" to include, where appropriate, "inadvertence, mistake pr carelessness." 507 U.S. at 3 8 8. Ultimately, the Court stated, the determination whether to allow a late claim is an equitable one that takes account of all of the surrounding circumstances:

These include . . . the danger of prejudice to the debtor, the length of the delay

and its potential impact on judicial proceedings, the reason for the delay,

including whether it was within the reasonable control of the movant, I WAS HELPING BY ENERATING REVENUE BUT NOT PAID CORRECTLY DUE TO THE PROCESS THAT STILL EXISTS ITS NOTTHE COURT ITS DEBTOR WHOFAILED TO FOLLOW THE RULES

18-23538-shl Doc 9336 Filed 03/02/21 Entered 03/03/21 17:39:31 Pages 1 PLEASE TAKE FURTHER NOTICE IN ALTHERWIP 17:39:37 P. OMNI OBJECTION THE COUNSEL FOR THE

DEBTOR STATES THE FOLLOW SPECIFICALLY - The Claim was filed after the applicable date set fot the in the Order Establishing Deadline to File Proofs of Claim and Procedm'es Relating Thereto. ente1'ed on Febma1'v 221 2019 (ECF No. 2676). IF THAT IS THE OBJECTION I OPPOSE ALL OF THE EXHIBITS LIST HERE IN ALONG WITH PAGE NUMBER LINE AND OBJECTION PER 9284

PLEASE TAKE FURTHER NOTICE EACH OF THE DEBTORS 23RD Debtors' Twenty-Third Omnibus Objection S to MY CLAIM Claims In re: Sears Holdings Corporation, et al. Case No. 18-23538 (RDD) INCLUDE THE ABOVE OBJECT ION AS WELL MY NAME AND CLAIMS

THE DEBTORS 2. SEARS HOLDING CORP AND ITS DIVSION SEARS HOME IMPROVEMENT HIRED ME ON 2-14-19 AS PER WELCOME LETTER RECIEVE BY THE HR DEPT ON 3-5-2018.

I START ON 3-12-18 AND SHOW BY RECORD OF CA FRANCHISE AND EMPLOYMENT DEVELOPMENT DEPT 6-12-19

THEN HIRED BY TRANSFORMCO AND NEVER PAID FOR CORRECTLY FOR THE PROJECTS FROM 5-1-2018 TO 6-12-19 THEN NOT PAID BY TRANSFORMCO. I REQUEST THIS ISSUE BE ADDRESSED AS I AM NOT CLASSIFIED AS A VENDOR I AM AW2 EMPLOYEE.

I WAS CONTACTED BY DEBTOR ON 09-2-120 TOLD THAT THEY INCESTIGATED THIS MATTER HOWEVER I AM TOLD THE STATEMENTS THAT MAKE UP MY WAGES THAT CONTAIN THE UNLAWFUL DEDUCTIONS AND GROSS ERRORS THATMAKE UP MY CLAIM PERPARED BY THE LABOR BOARD WAGE AND STANDARDS UNIT IN LONG BEACH ON 11-13-19 AFTER I

FILED 2 CLAIMS ONE WITH THE DEBTOR AND ONE WITH TRANSFORM CO. THE DEBTORS CASE WAS SENT HERE. THE <u>TRANSFORM CO CASE 809099</u>
<u>IS AWAITING A HEARING WHICH MAY TAKE UP TO A YEAR OR MORE WITH CURRENT BACK LOGS</u>. I REQUEST THE COURT ENFORCE THE CASE THAT
IS ATTACHED AS I HAVE ALREADY SUPPLIED THE DEBTOR THE FINDINGS AND REQUEST CONSIDERATION FOR PENALITIES AS THIS DELAY IN MY PAY
FOR WORK PERFOIRMED

WERE I GENERATE REVENUE AS REQUIRED AND DEBTORS DO ACKNOWLEGGE THIS BUT FAIL TO PAY ME AND PERFORM THEIR OWN STANDARD WITH REGARDS TO THEIR OWN POLICY AND THE CALIFORNIA LABOR LAW S 200-515 SEE CODES IN MY CLAIM DOCUMENTATION 1186. ATTACHED SEE LIST OF EACH OF OBJECTION AND ITS LOCATION DEBTORS OBJECTION MOTION TO DISALLOW MY ONE CLAIM THAT IS WAGES UNPAID AND YES LONG AFTER 10-15-18.

PLEASE TAKE FURTHER NOTICE I OPPOSE ALL OBJECTIONS TO CLAIM# 24733

AND 24734 IN DOC 9284 WERE IT STATES

The Claim was filed after the applicable date set fo1th in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676).

Exhibit A
Pg 5 of 102 OF DOC 9284

Exhibit A MAIN DOCUMENT

Exhibit B
AGE 20 OF 102 DOC 9284 - PG 15 OF 27
Pg 33 of 102 OF DOC 9284
Exhibit B Claims Hearing Procedures COURT-ORDERED CLAIMS HEARING PROCEDURES 34-102

DEBTORS' TWENTY-THIRD OMNIBUS OBJECTION TO PROOFS OF CLAIM (NO LIABILITY CLAIMS) PAGE 37 OF 102

PAGE 33 OF 102 DOC 8294 - PG 15 OF 27

Claims Hearing Procedures: Pursuant to the Amended Order Implementing Ce1tain Notice and Case Management Procedures, entered on November 1, 2018 (ECF No. 405) (the "Amended Case"

Management Order"), the Bankruptcy Comt established periodic omnibus hearings

(the "Omnibus Hearings") in these Chapter 11 cases. The Debtors shall schedule the

retmn date for claims objections, omnibus or othe1wise, for hearing at Omnibus Hearings

or other hearings the Debtors may schedule with the Bankruptcy Comt.

OBJECTION TO CLAIM(S) 24733/24734* (24734 AMENDED / REMOVED AS DUPLICATE) IN Exhibit A

PAGE 43 OF 102 DOC 9284

EXHIBIT A. PAGE PAGE 15 OF 27 OF DOC 9284

Debtors' Twenty-Third Omnibus Objection to Claims In re: Sears Holdings Corporation, et al.

Exhibit 1 - Disallowed Claims Case No. 18-23538 (RDD)

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PAGE 2

OPPOSTION REPSONSE TO 23RD OMNIBUS OBJECTION DOC 9284 FROM DEBTORS' IN CASE 18-23538/ 18-23555

Exhibit A

PAGE 58 OF'102 DOC 9284

EXHIBIT A. PAGE 15 OF 27 OF DOC 9284

Debtors' Twenty-Third Omnibus Objection to Claims In re: Sears Holdings Corporation, et al.

Exhibit 1 - Claims Case No. 18-23538 (RDD)

The Claim was filed after the applicable date set forth in the

Order Establishing Deadline to File Proofs of Claim and

Procedures Relating Thereto, entered on February 22,

2019 (ECF No. 2676)

EXHIBIT B PROPOSED ORDER

AGE 71 OF 102 DOC 9284

EXHIBIT B. PROPOSES ORDER order 15 OF 27 OF DOC 9284

Debtors' Twenty-Third Omnibus Objection to Claims In re: Sears Holdings Corporation, et al.

Exhibit 1 - Claims Case No. 18-23538 (DDD)

The Claim was filed after the applicable date set forth in the

Order Establishing Deadline to File Proofs of Claim and

Procedures Relating Thereto, entered on February 22,

2019 (ECF No. 2676)

EXHIBIT 1 PROPOSED ORDER

AGE 75 OF 102 DOC 9284

PAGE 15 OF 27 OF DOC 9284

Debtors' Twenty-Third Omnibus Objection to Claims In re: Sears Holdings Corporation, et al.

Exhibit 1 - Claims Case No. 18-23538 (RDD)

The Claim was filed after the applicable date set forth in the

Order Establishing Deadline to File Proofs of Claim and

Procedures Relating Thereto, entered on February 22,

2019 (ECF No. 2676)

EXHIBIT 1 PROPOSED ORDER

AGE 91 OF 102 DOC 9284

EXHIBIT 1 PROPOSED ORDER

AGE 15 OF 27 OF DOC 9284

Debtors' Twenty-Third Omnibus Objection to Claims In re: Sears Holdings Corporation, et al. The

Claim was filed after the applicable date set forth in the

Order Establishing Deadline to File Proofs of Claim and

Procedures Relating Thereto, entered on February 22,

2019

PAGE 3 18-23538-shl Doc 9336 Filed 03/02/21 Entered 03/03/21 17:39:31 Pages 1 through 7 Pg 5 of 7 OPPOSTION REPSONSE TO 23RD OMNIBUS OBJECTION DOC 8294 FROM DEBTORS' IN CASE 18-23538/18-23555

Exhibit A

PAGE 58 OF'102 DOC 9284

EXHIBIT A. PAGE 15 OF 27 OF DOC 9284

Debtors' Twenty-Third Omnibus Objection to Claims In re: Sears Holdings Corporation, et al. Exhibit 1 - Claims Case No. 18-23538 (RDD)

The Claim was filed after the applicable date set forth in the

Order Establishing Deadline to File Proofs of Claim and

Procedures Relating Thereto, entered on February 22,

2019 (ECF No. 2676)

EXHIBIT B PROPOSED ORDER

AGE 71 OF 102 DOC 9284

EXHIBIT B. PROPOSES ORDER order 15 OF 27 OF DOC 9284

Debtors' Twenty-Third Omnibus Objection to Claims In re: Sears Holdings Corporation, et al. Exhibit 1 - Claims Case No. 18-23538 (DDD)

The Claim was filed after the applicable date set forth in the

Order Establishing Deadline to File Proofs of Claim and

Procedures Relating Thereto, entered on February 22,

2019 (ECF No. 2676)

EXHIBIT 1 PROPOSED ORDER

AGE 75 OF 102 DOC 9284

PAGE 15 OF 27 OF DOC 9284

Debtors' Twenty-Third Omnibus Objection to Claims In re: Sears Holdings Corporation, et al. Exhibit 1 - Claims Case No. 18-23538 (RDD)

The Claim was filed after the applicable date set forth in the

Order Establishing Deadline to File Proofs of Claim and

Procedures Relating Thereto, entered on February 22,

2019 (ECF No. 2676)

EXHIBIT 1 PROPOSED ORDER

AGE 91 OF 102 DOC 9284

EXHIBIT 1 PROPOSED ORDER

AGE 15 OF 27 OF DOC 9284

Debtors' Twenty-Third Omnibus Objection to Claims In re: Sears Holdings Corporation, et al. The Claim was filed after the applicable date set forth in the

Order Establishing Deadline to File Proofs of Claim and

Procedures Relating Thereto, entered on February 22,

2019

FOR ALL OF THE EXHIBIT I RESPOND AND HAVE PROOF THAT I WAS ONBOARDED 2-14-18 OFFERED EMLOYMENT 3-05-18 AND THEN LICENSED 4-20-18 AND RECORED RECORD NUMBERS AS WELL GENEREATED MORE REVENUE THAN MY PIERS MONTH AFTER MONTH WITH THE MIND SET TO HELP A FAILING CORP I HAD MUCH RESPECT FOR .. THEY HAD NONE FOR ME.

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PLEASE DO TAKE NOTICE; BEAU BRADY LEBARON HAVE REVIEWED DOC 8294
23RD THE OMNIBUS OBJECTION AND ACKNOWEDGE MY NAME A STATED ABOVE
(SEE LINE 210 OF EXHIBITS A. B. & C.) FOR CLAIMS(S) 24733/24734 CASE 18-23538
I OPPOSE THE OBJECTION AND DISALLOWANCE FOR THE OF CLAIM 24733
\$70,615.73 FOR THE REASON OF EXUSABLE NEGELEST.

I WORKED FOR SEARS HOLDING CORPORATION (DEBTOR) FROM START DATE

3-12-18 TO TERMINATION DATE 6-12-19.

EXHIBIT A - COMMINCATION FROM TRRANSFORMCO NEW OWNER/APPRIVED BUYER. ASC/HR DEPT. STATING THE SAME ABOVE MENTIONED DATE ALONG WITH COMPLETE PAY INFORMATION FOR MY EMPLYEE ID NUMBER 71024523207.

IN CALFORNIA I WORKED AS A W 2 FULL TIME COMMISSIONED BI WEEKLY EMPLOYEE WITH A COMPESATION PLAN CA SEARS CONSULTANT PLAN 1591 CALIFORNIA EMPLOYEES ONLY. AGREED AND SIGNED PRIOR TO EMPLOYMENT (IF NOT SIGNED EMPLOYMENT IS NOT OFFERED) ANOTHER WORDS MANDATORY.

1. BY LIVE SCAN 2-14-18 AS WELL AS EMPLOYEE WELCOME LETTER SENT ON 2-14-18

THAT INCLUDES LIFE CREDIT POLICY AWARDED IMMEDIATELY UPON COMPLETION OF 4 WEEK TRAINING > DRUG SCREENING

1. LICENSING HANDLED BY THE DEBTORS IN HOUSE HR DEPT FOR CAL STATE

LICENSING BOARD H.I.S. HOME IMPROVEMENT SALES PERSON. #331127 SP ACTIVE THEN 4-18-18 THROUGH 4-20-19 AND THEN REISSUED AFTER THE FIRST YEAR AND

CURRENTLY ACTIVE UNTIL 4-22-22.

I WILL PROVIDE A HARD COPY TO CHAMBER VIA WORD DOC AND WILL UP LOAD MY VERSION TO THE HONORABLE JUDGE ROBERT DRAIN. I HAVE A W 2 AND I AM CERTAIN THAT EXIHIBIT

A - F SHOULD PROVE THAT I WAS EMPLOYED GENERATING DOLLARS USED BY MY FORMER EMPLOYER WHO LEASED ME WITHOUT MY KNOWLEDGE FROM 2-22-19 TO 6-12-19.

PLEASE UPDATE MY NUMBER CELL 714 476-0192

I DO WISH TO BE HEARD ON MARCH 23 RD VIA TELEPHONIC MEANS

X_____BCAULCBARON

date 3-01-2021

SENT TO PRIME CLERK 3-1-2021 DOMINIC LITZ FOR THE WEIL LAW TEAM COUNCEL TO DEBTORS SEARS HOLDINGS CORP AND THE NEW YORK US BANK RUPTCY COURT SOUTHERN DIVISION FOR CASE 18-23538 AND CASES THAT FALL UNDER IT. INCLUDING 18-23555 18-23538-shl Doc 9336 Filed 03/02/21 Entered 03/03/21 17:39:31 Pages 1 through 7 Pg 7 of 7

OPPOSTION REPSONSE TO 23RD OMNIBUS OBJECTION DOC 9284 FROM DEBTORS' IN CASE 18-23538/ 18-23555

EXHIBIT A -

COMMINCATION FROM TRRANSFORMCO NEW OWNER / APPRIVED BUYER . ASC/HR DEPT . STATING THE SAME ABOVE MENTIONED DATE ALONG WITH COMPLETE PAY INFORMATION FOR MY EMPLYEE ID NUMBER 71024523207.

THIS IS FROM THE DEBTORS NEW OWNER SHOWING MY DATES WITH BOTH THE DEBTOR AND THE NEW OWNER DATED 2017-21

PLEASE TAKE NOTICE I WAS HIRES AND TERM WITH COBRA AND FULL BENENFITS

From: ASC Customer Service,

Sent: Friday, February 19, 2021 10:22 AM

To: Beau LeBaron

Subject: RE: employment dates

Hi Beau,

Thank you for writing to us,

With reference to below email, please see the employment dates with Sears and TransformCo.

Hire Date: 03/12/2018 Terminated: 06/12/2019

TransformCo:

Hire Date: 06/12/2019 Terminated: 07/20/2019

Please let us know if you do required any more information. Kindly let us know for further assistance

Thank You, Grace

From: Beau LeBaron [mailto:BeausEverest@outlook.com] Sent: Wednesday, February 17, 2021 9:14 PM

To: ASC Customer Service,

<ASCCustomerService@transformco.com>

Subject: Re: employment dates

Enterprise Security Team Alert: This email originated from outside of the organization. Please

caution when opening messages from external sources.